

EXHIBIT N

**CERTIFIED COPY**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**LARGO CONCRETE, INC., A CALIFORNIA CORPORATION; ET AL.,**

PLAINTIFFS,

V.

LIBERTY MUTUAL FIRE INSURANCE COMPANY, A  
MASSACHUSETTS CORPORATION, AND DOES 1  
THROUGH 100, INCLUSIVE,

DEFENDANTS.

) NO. C07-04651 CRB (ADR)

**DEPOSITION OF: SUSAN OLSON**  
**TAKEN: FRIDAY, NOVEMBER 16, 2007**

*Dalene Court Reporters*

16161 Ventura Boulevard, #734

Encino, California 91436

Telephone: 661.726.0584

Reported By:  
Magdalene S. Puente

TSR 8498



1 APPEARANCES OF COUNSEL:

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3 FOR THE PLAINTIFFS:

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9 818.992.9999

10  
11 FOR THE DEFENDANTS:

12 GRACE, COSGROVE & SCHIRM  
13 A PROFESSIONAL CORPORATION  
14 BY: LISA KRALIK-HANSEN, ESQ.  
15 444 SOUTH FLOWER STREET  
16 SUITE 1100  
17 LOS ANGELES, CALIFORNIA 90071  
18 213.533.5400

19 SHEPPARD, MULLIN, RICHTER & HAMPTON, LLP  
20 BY: SCOTT R. SVESLOSKY, ESQ.  
21 333 SOUTH HOPE STREET  
22 48TH FLOOR  
23 LOS ANGELES, CALIFORNIA 90071-1448  
24 213.620.1780

25 ALSO PRESENT:

MICHAEL L. PHILLIPS, ESQ.

1 LITIGATOR?

2 A. I PRACTICED FROM 1983 TO 2005. WELL, TAKE  
3 THAT BACK. IT WAS 2006 WHEN I FINALLY RETIRED.

4 Q. WHEN IN 2006?

5 A. MY OFFICIAL RETIREMENT DATE WAS OCTOBER 10TH,  
6 I THINK, BUT MY LAST DAY OF WORK WAS MAY 30TH.

7 Q. 2006?

8 A. 2006.

9 Q. YOU'RE HERE UNDER A SUBPOENA IN THIS CASE  
10 CALLED LARGO.

11 YOU UNDERSTAND THAT?

12 A. I UNDERSTAND THAT.

13 Q. AND YOU'RE HERE REPRESENTED BY MS. KRALIK?

14 A. YES.

15 MR. ROXBOROUGH: YOU GO BY KRALIK-HANSEN?

16 MS. HANSEN: HANSEN IS FINE.

17 BY MR. ROXBOROUGH:

18 Q. YOU'RE HERE BEING REPRESENTED BY MS. HANSEN?

19 A. I'M BEING REPRESENTED BY MS. HANSEN, YES.

20 Q. AND YOU'RE AWARE THAT MS. HANSEN HAS SUBMITTED  
21 A DECLARATION IN THE LARGO CASE DISQUALIFYING OUR FIRM;  
22 CORRECT?

23 A. NO, I'M NOT.

24 Q. OTHER THAN -- OKAY. MAY I ASK: IS LIBERTY  
25 PAYING FOR MS. HANSEN TO REPRESENT YOU?

1 ALLOW ME TO ASK QUESTIONS ABOUT MS. OLSON'S INVOLVEMENT 01:42:27  
2 ON YOUR DECLARATION. IT'S THAT SIMPLE. 01:42:31

3 MS. HANSEN: YOU'RE NOT ENTITLED TO GET INTO 01:42:34  
4 COMMUNICATIONS WITH RESPECT TO -- THE COMMUNICATIONS 01:42:36  
5 AMONG ATTORNEYS REGARDING LEGAL WORK DONE. THAT FALLS 01:42:39  
6 WITHIN THE ATTORNEY WORK PRODUCT RULE. 01:42:43

7 MR. ROXBOROUGH: NOT WHEN YOU PREPARE A 01:42:46  
8 DECLARATION FOR YOU. 01:42:46

9 BY MR. ROXBOROUGH: 01:42:46

10 Q. NOW, MS. HANSEN SAYS UNDER PENALTY OF PERJURY 01:42:48  
11 ON LINE 20 THAT YOU'RE THE PERSON -- THAT YOU'RE ONE OF 01:42:51  
12 THE PEOPLE THAT PARTICIPATED IN HER KENTUCKY 01:42:55  
13 DECLARATION. 01:42:59

14 HOW DID YOU PARTICIPATE? 01:43:00

15 A. I JUST EXPLAINED TO YOU HOW I PARTICIPATED. 01:43:02

16 Q. THAT PHONE CALL? 01:43:06

17 A. THAT PHONE CALL. 01:43:07

18 Q. ANY OTHER PHONE CALLS AFTER THAT? 01:43:08

19 A. NOT THAT I CAN RECALL. I MAY HAVE HAD ONE 01:43:09  
20 WITH MS. HANSEN, BUT I DON'T RECALL IT. 01:43:13

21 Q. BECAUSE THIS -- 01:43:15

22 A. LET ME EXPLAIN, NICK, THAT I HAD HAD MAJOR 01:43:16  
23 SURGERY JUST BEFORE THIS AND SO I WAS ON SOME PRETTY 01:43:20  
24 SUBSTANTIAL DRUGS. 01:43:23

25 Q. THE ONLY REASON I'M ASKING IS BECAUSE WHEN I 01:43:24

1 TO THE EXPERTS.

2 Q. YOU DIDN'T SUPERVISE MR. PYNES'S WORK ON THIS  
3 CASE.

4 THE DECLARATIONS THAT HAVE BEEN SUBMITTED SO  
5 FAR THAT OTHER PEOPLE HAVE, YOU DIDN'T HAVE ANY  
6 INVOLVEMENT, BUT I JUST WANT TO MAKE SURE.

7 A. MS. YEE DID THE PRIMARY SUPERVISION, I  
8 BELIEVE, AND MS. HANSEN DID A LITTLE. I MAY HAVE  
9 LOOKED AT SOME OF THE THINGS, BUT I DON'T RECALL.

10 Q. MS. HANSEN'S DECLARATION IS THE VOICE OF ANY  
11 SPECIFICITY ON THAT SUBJECT AND MS. YEE'S DECLARATION  
12 SIMPLY SAYS SHE GAVE HIM A SPECIAL PROJECT WHICH  
13 CONSISTED OF REVIEWING A COUPLE OF CLAIM FILES AND  
14 REDACTING.

15 YOU'VE WORKED ON PRIVILEGE LOGS BEFORE ON  
16 THESE KINDS OF CASES AND YOU'RE FAMILIAR WITH THEM  
17 GENERALLY?

18 A. YES, I AM.

19 Q. AND DO YOU RECALL, FOR EXAMPLE, THE REMEDYTEMP  
20 PRIVILEGE LOG?

21 A. YES, I DO.

22 Q. AND DO YOU RECALL THE REDACTIONS WERE LIMITED  
23 TO PRIVATE INFORMATION OF THE INJURED WORKER, THAT WAS  
24 THE CONCERN UNDER LABOR CODE 3762?

25 A. I RECALL --



1 STATE OF CALIFORNIA )  
2 ) SS.  
3 COUNTY OF LOS ANGELES )

4 I, MAGDALENE S. PUENTE, CERTIFIED SHORTHAND  
5 REPORTER, CERTIFICATE NUMBER 8498, FOR THE STATE OF  
6 CALIFORNIA, HEREBY CERTIFY:

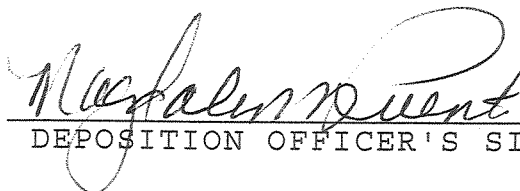
7 THE FOREGOING PROCEEDINGS WERE TAKEN BEFORE ME  
8 AT THE TIME AND PLACE THEREIN SET FORTH, AT WHICH TIME  
9 THE DEPONENT WAS PLACED UNDER OATH BY ME;

10 THE TESTIMONY OF THE DEPONENT AND ALL  
11 OBJECTIONS MADE AT THE TIME OF THE EXAMINATION WERE  
12 RECORDED STENOGRAPHICALLY BY ME AND WERE THEREAFTER  
13 TRANSCRIBED.

14 THE FOREGOING TRANSCRIPT IS A TRUE AND CORRECT  
15 TRANSCRIPT OF MY SHORTHAND NOTES SO TAKEN;

16 I FURTHER CERTIFY THAT I AM NEITHER COUNSEL  
17 FOR NOR RELATED TO ANY PARTY TO SAID ACTION NOR IN ANY  
18 WAY INTERESTED IN THE OUTCOME THEREOF.

19 IN WITNESS WHEREOF, I HAVE HEREUNTO SUBSCRIBED  
20 MY NAME THIS 23rd DAY OF November, 2007.  
21  
22  
23  
24  
25

  
DEPOSITION OFFICER'S SIGNATURE